

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

UNOPPOSED MOTION TO FILE UNDER SEAL

Plaintiff States (“States”) respectfully move the Court for leave to file under seal PLAINTIFF STATES’ RESPONSE TO DEFENDANT GOOGLE’S OBJECTION TO REPORT AND RECOMMENDATION and the exhibit thereto, to be filed later today. Defendant Google LLC (“Google”) does not oppose the States’ sealing request.

The States, with Google’s consent, request to file under seal their Motion and exhibits because, according to Google: they reveal individual employee names and identities. Google intends to propose publicly available versions of these documents be filed with limited redactions only to protect individual personnel information. Consistent with Local Rule CV-5, the States will work with Google to file redacted versions—with as limited redactions as possible—of the above-referenced documents within seven (7) days.

For the reasons stated above, the States respectfully request that this Court allow the States to file the above-referenced documents under seal.

Dated: April 30, 2024.

Respectfully submitted,

/s/ W. Mark Lanier

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Submitted on behalf of all Plaintiff States

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CERTIFICATION OF CONFERENCE

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that Google LLC does not oppose the foregoing sealing request.

/s/ Geraldine Young
Geraldine Young

CERTIFICATE OF SERVICE

I certify that on April 30, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Mark Lanier
Mark Lanier